

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
GENOVA BURNS LLC Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstolz@genovaburns.com dclarke@genovaburns.com gtkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel for the Official Committee of Talc Claimants</i>	BROWN RUDNICK LLP David J. Molton, Esq. Michael S. Winograd, Esq. Susan Sieger-Grimm, Esq. Kenneth J. Aulet, Esq. dmolton@brownrudnick.com mwinograd@brownrudnick.com ssieger-grimm@brownrudnick.com kaulet@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 And- Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Eric R. Goodman, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com egoodman@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
OTTERBOURG PC Melanie L. Cyganowski, Esq. Adam C. Silverstein, Esq. mcyganowski@otterbourg.com asilverstein@otterbourg.com 230 Park Avenue New York, NY 10169 Tel: (212) 905-3628 Fax: (212) 682-6104 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>	MASSEY & GAIL LLP Jonathan S. Massey, Esq. Rachel S. Morse, Esq. jmassey@masseygail.com rmorse@masseygail.com 1000 Maine Ave. SW, Suite 450 Washington, DC 20024 Tel: (202) 652-4511 Fax: (312) 379-0467 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i>
In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**CERTIFICATION IN SUPPORT OF APPLICATION FOR RETENTION OF
PROFESSIONAL, OTTERBOURG P.C., EFFECTIVE AS OF APRIL 14, 2023**

I, Melanie L. Cyganowski, being of full age, certify as follows:

1. I am seeking authorization on behalf of Otterbourg P.C. (“Otterbourg”) to be retained as co-counsel to the Official Committee of Talc Claimants (the “Committee”) for LTL Management LLC (the “Debtor”) in the above-captioned case (“Case”), effective as of April 14, 2023, the date on which the Committee selected Otterbourg to serve as its co-counsel and the date on which Otterbourg commenced providing legal services to the Committee.

2. My professional credentials include: I am an attorney at law in good standing of the bar of the State of New York and am admitted to practice in, among other courts, the courts of the State of New York, the United States Supreme Court, the Courts of Appeals for the Second and Third Circuits, and the United States District Courts for the Eastern District of New York and Southern District of New York. I am the former Chief United States Bankruptcy Judge for the Eastern District of New York. An order for my admission *pro hac vice* was entered by the Court on November 30, 2021 in the Debtor’s first bankruptcy case commenced on October 14, 2021, Case No. 21-30589 (“LTL I”) [LTL I, Dkt. No. 572], and has since been reauthorized in this case [Dkt. No. 342].

3. I am a Member of the law firm of Otterbourg, which maintains an office at 230 Park Avenue, New York, New York 10169-0075.

4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Subject to the Court’s approval, and in accordance with section 330(a) of the Bankruptcy Code and any orders of the Court, Otterbourg will charge for its legal services as co-counsel to the Committee on an hourly basis in accordance with its ordinary and customary hourly rates in effect

on the date such services are rendered, and for its actual, reasonable and necessary out-of-pocket disbursements incurred in connection therewith. The current hourly rates of Otterbourg professionals are in the following ranges:

Professional	Rate Per Hour
Members / Of Counsel	\$710 – \$1,620
Associates	\$325 – \$905
Paralegals	\$380

The hourly rates set forth above are Otterbourg's general hourly rates for work of this nature and are consistent with the customary compensation charged by comparably skilled attorneys at Otterbourg in similar matters, including non-bankruptcy matters. In the normal course of its business, Otterbourg revises its billing rates on an annual basis².

Otterbourg has advised the Committee that it intends to apply to the Court for allowance of compensation and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the applicable Bankruptcy Rules, the Local Rules, any orders establishing procedures for monthly compensation and reimbursement of expenses of professionals, and further orders of the Court. Otterbourg will maintain detailed records of fees and expenses incurred in connection with the rendering of the professional services described above, in accordance with applicable rules and guidelines.

Otterbourg has advised the Committee that it intends to seek compensation for all time and expenses associated with the preparation of this application to retain Otterbourg and related

² Pursuant to its ordinary practice, Otterbourg generally revises its rates as of October 1st of each year. At least ten (10) days before implementing any increases in Otterbourg's rates for professionals in this Case, Otterbourg shall file a supplemental affidavit with the Court explaining the basis for the rate increases in accordance with section 330 of the Bankruptcy Code. All parties in interest, including the U.S. Trustee, retain all rights to object to any rate increase on all grounds, including the reasonableness standard provided for in section 330 of the Bankruptcy Code..

documents, and the preparation of monthly, interim and final fee applications for Otterbourg. It will not bill for the defense of any fee applications, unless otherwise permitted by an order of the Court. Otterbourg will bill any non-working travel time at 50% of the actual time incurred.

In addition, Otterbourg requests that it be reimbursed for any actual and necessary expenses incurred in representing the Committee, including, but not limited to, business meals, photocopies, courier service, computer-assisted research, docket and court filing fees, mail and express mail charges, messenger charges, document processing, telecommunications, travel, court reporting charges, and any other non-ordinary overhead expense such as overtime for secretarial personnel and other staff and any other incidental costs advanced by Otterbourg specifically for the representation of the Committee, in a manner and at rates consistent with charges made generally to Otterbourg's other clients. Photocopies and similar copies will be billed at a reduced rate of \$0.10 per page.

Otterbourg has not agreed to share: (a) any compensation it may receive with another party or person, other than with the Members, Of Counsel, and associates of Otterbourg; or (b) any compensation another person or party has received or may receive in connection with this Case. Otterbourg has not received a retainer in connection with this Case.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection:

In preparing this Certification, an attorney working under my supervision caused the implementation of certain procedures developed by Otterbourg to ensure full compliance with the requirements of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules (collectively, the “Statutory Authority”). Pursuant to the Statutory Authority, to identify the parties relevant to this Certification and to ascertain Otterbourg’s connections to certain parties, the Otterbourg attorney caused to be performed an examination and comparison of the known names included in the following categories of entities who may be parties in interest (collectively, the “Potentially Interested Parties”) in this Case, including:

- (a) Members of the Committee;
- (b) The Debtor, direct equity, non-debtor affiliates, and direct non-debtor subsidiary;
- (c) Managers and officers of the Debtor;
- (d) Alleged major current business affiliations of the Debtor’s Managers;
- (e) Depository and disbursement bank;
- (f) Alleged major sureties;
- (g) Alleged parties to the Debtor’s material contracts;
- (h) Alleged significant co-defendants in talc-related litigation;
- (i) The Debtor’s proposed professionals and claims agent;
- (j) The Debtor’s proposed significant ordinary course professionals, consultants and service providers;
- (k) Known professionals for certain non-debtor parties in interest;
- (l) Proposed Future Claimants’ Representative and her proposed professional;
- (m) Alleged material potentially indemnified parties;
- (n) Alleged parties who have entered into plan support agreements;
- (o) Law firms with significant representations of talc claimants;

- (p) Alleged key parties in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.* chapter 11 cases;
- (q) The Debtor's alleged insurers;
- (r) Alleged potential parties in Canadian Proceeding;
- (s) Alleged States/Federal District with consumer protection investigations/actions;
- (t) Office of the United States Trustee for Region 3 – District of New Jersey;
- (u) The Bankruptcy Judges for the District of New Jersey;
- (v) Alleged retailers and indemnified parties; and
- (w) Alleged top 30 law firms with the most significant representations of talc claimants

A copy of the list of the Potentially Interested Parties searched by Otterbourg is attached hereto as

Schedule 1.

An attorney working under my supervision then caused a comparison of each of the Potentially Interested Parties to the names that Otterbourg has compiled into a computerized master client database, comprised of the names of current or former clients (the "Clients"), and the names of the parties that were related to or adverse to the Clients (the "Client Database").

A list of the Clients that are Potentially Interested Parties (the "Client Data List") is attached as **Schedule 2**. An inquiry was made, where appropriate, of the respective Otterbourg personnel responsible for the current or former matters to verify that Otterbourg does not represent or hold an interest adverse to the interests of the Debtor's estate with respect to any entity on the Client Data List in connection with the Debtor or this Case. In addition, a determination was made as to whether any of the entities on the Client Data List were former, rather than current, Clients.

I have reviewed the Client Data List, and have ascertained, to the best of my knowledge, that neither I nor any Member, "of counsel" or associate of Otterbourg currently represents

professionally or is associated with the Debtor, its creditors or any other Potentially Interested Parties, except to the extent set forth below and in Schedule 2.

Bank of America, N.A. (“BOA”) is a current client of Otterbourg. BOA is not a creditor of the Debtor. In the *Declaration of John K. Kim in Support of First Day Pleadings* (the “First Day Declaration”) [Dkt. No. 4], the Debtor states that it maintains a bank account at BOA in Charlotte, North Carolina. I understand from the First Day Declaration that the Debtor intends to direct all payments and other funds received by the Debtor into the BOA bank account, and for that bank account to serve as the Debtor’s disbursement account. Otterbourg has not, does not and will not represent BOA in any matters related to this Case or to the Debtor. The attorneys at Otterbourg that provide services to BOA are not part of Otterbourg’s bankruptcy department.

Further, with respect to the Client Data List, Otterbourg formerly represented an ad hoc group of certain talc claimants (the “Ad Hoc Group”), consisting of nine members of the official committee of talc claimants appointed in LTL I (the “TCC”): Alishia Landrum (represented by Beasley Allen Law Firm); Rebecca Love (represented by Ashcraft & Gerel, LLP); Blue Cross Blue Shield of Massachusetts; Tonya Whetsel (represented by Karst von Oiste LLP); Kristie Doyle (represented by Kazan, McClain, Satterley & Greenwood PLC); William A. Henry (represented by Levin Papantonio Rafferty); Randy Derouen (represented by Levy Konigsberg LLP); April Fair (represented by Robinson Calcagnie, Inc.); and Patricia Cook (represented by Weitz & Luxenberg, P.C.). As co-counsel to the Ad Hoc Group, the following documents were filed on behalf of the Ad Hoc Group: (i) an informational brief; (ii) an omnibus objection to the first day relief requested by the Debtor; and (iii) an objection to the Debtor’s motion to seal certain exhibits related to the Debtor’s complaint for injunctive relief. [Dkt. Nos. 79, 103; Adv. Pro. No. 23-01092, at Dkt. No. 27]. Upon the Committee’s selection of Otterbourg as co-counsel in this Case on April 14, 2023,

Otterbourg immediately ceased its representation of the Ad Hoc Group. After the conclusion of its representation of the Ad Hoc Group, Otterbourg promptly commenced providing legal services to the Committee in this Case. Otterbourg received no retainer from or on behalf of the Ad Hoc Group for its services in connection with this Case.

Further, with respect to the Client Data List, Otterbourg formerly represented the Plaintiffs' Steering Committee (the "PSC") in the multi-district litigation of *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation* (MDL No. 2738) pending before the United States District Court for the District of New Jersey. The PSC was appointed on December 6, 2016, years prior to the commencement of LTL I (and this Case). Otterbourg was initially retained to represent the PSC in LTL I.³ By Order, entered on November 8, 2021, the United States Bankruptcy Court for the Western District of North Carolina approved the formation of the TCC, comprised of 11 members. [LTL I, Dkt. No. 355]. Following the appointment of that committee, Otterbourg was selected to serve as TCC's co-counsel and Otterbourg immediately ceased its representation of the PSC.

On December 23, 2021, the US Trustee reconstituted and amended the composition of the statutory committee into two official committees: Official Committee of Talc Claimants I ("TCC I") and Official Committee of Talc Claimants II ("TCC II"). TCC I was comprised of 9 members, of which 7 members were appointed to the originally appointed statutory committee and 2 members were newly appointed members. Effective April 12, 2022, the originally appointed statutory committee (*i.e.*, the TCC) was reinstated and Otterbourg was selected to serve as its co-

³ Otterbourg and the Beasley Allen Law Firm ("Beasley Allen"), one of the co-chairs of the PSC, entered into a retention agreement (the "Retention Agreement"). Shortly thereafter, on October 17, 2021, the PSC agreed to (a) retain Otterbourg as its counsel in LTL I, (b) assume the Retention Agreement, and (c) pay the fees and expenses required by the Retention Agreement. The total amount of fees received in connection with Otterbourg's representation of the PSC in LTL I was less than 1% of Otterbourg's gross revenue (based upon 2021/2022 gross numbers).

counsel in LTL I. On April 4, 2023, the Court entered its *Order (I) Dismissing Debtor's Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* (the "Dismissal Order") [LTL I, Dkt. No. 3938]. On April 4, 2023, LTL Management LLC (as the debtor in LTL I) filed its *Notice of Debtor's Intent Regarding Appeals* [LTL I, Dkt. No. 3939] confirming that it would not pursue the Appeals (as defined in the Dismissal Order), thereby resulting in the automatic dissolution of the TCC pursuant to the terms of the Dismissal Order⁴.

In accordance with the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals*, dated December 9, 2021 (as modified by the Court's *Order Modifying Order Establishing Procedures for Interim Compensation and Reimbursement of Retained Professionals*, dated December 17, 2021) [LTL I, Dkt. Nos. 761, 870], and the *Order Appointing an Independent Fee Examiner and Establishing Procedures*, dated March 31, 2022 [LTL I, Dkt. No. 1922], Otterbourg submitted and filed monthly statements and applications for allowance of compensation and reimbursement of expenses in LTL I.

As of the Court's entry of the Dismissal Order on April 4, 2023, Otterbourg was owed \$752,734.54 for services rendered and expenses incurred in representing the TCC as its co-counsel in LTL I (the "Pre-Petition Balance"). On April 26, 2023, the Debtor filed a motion seeking the entry of an order authorizing it to satisfy its obligations under the Dismissal Order, including the final allowance of professional fees and expenses and the payment of such allowed fees and expenses (the "Obligations Motion"). [Dkt. No. 319]. Pending entry of an order approving the Obligations Motion, Otterbourg anticipates that the allowed amount of the Pre-Petition Balance

⁴ Under the terms of the Dismissal Order, the TCC remained in existence after the date of dismissal for the sole limited purpose of allowing the TCC to pursue or defend any Appeals (as defined in the Dismissal Order) with its Retained Professionals (as defined in the Dismissal Order and which included Otterbourg as co-counsel to the TCC) authorized to continue to perform services on the TCC's behalf.

will be paid in connection with LTL I.

Otterbourg has represented, currently represents, and may in the future represent certain parties-in-interest or potential parties-in-interest in this Case in other matters *unrelated* to the Debtor, this Case, or such entities' claims against the Debtor.

Otterbourg may have worked with professionals (*e.g.*, as co-counsel or adversaries) in other cases where those professionals represent Potentially Interested Parties in the case and may have represented official or informal committees in which the individual members may have an interest in this Case. Otterbourg also may represent financial institutions that may have been or are currently lenders to a Potential Party in Interest. As noted, however, Otterbourg has not and will not represent any clients in connection with this Case except for the Committee.

As a matter of disclosure, on June 14, 2022, the United States District Court for the Southern District of New York entered an order appointing me (Melanie L. Cyganowski) as the Receiver for StraightPath Venture Partners LLC, StraightPath Management LLC, SP Ventures Fund LLC, SP Ventures Fund 2 LLC, SP Ventures Fund 3 LLC, SP Ventures Fund 4 LLC, SP Ventures 5 LLC, SP Ventures 6 LLC, SP Ventures 7 LLC, SP Ventures 8 LLC, and SP Ventures 9 LLC (collectively, the "SP Receivership Entities") in an action (the "SEC Action") commenced by the Securities and Exchange Commission, styled *Securities and Exchange Commission v. StraightPath Venture Partners LLC, et al.*, Case No. 1:22-cv-03897-LAK. To assist in the discharge of my duties as Receiver for the SP Receivership Entities, a motion was filed in the SEC Action for the entry of an order approving the retention of Berkeley Research Group, LLC ("BRG") as tax advisor to the Receiver, effective as of August 12, 2022. On September 7, 2022, an order was entered in the SEC Action approving that motion. In connection with the Debtor's first bankruptcy case, this Court entered an order authorizing Randi S. Ellis, the Legal

Representative for Future Talc Claimants, to retain BRG to provide expert consulting services and analysis of talc claim liability, effective as of July 1, 2022. [LTL I, Dkt. No. 2801]. According to the Debtor's *List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* filed in this Case on April 17, 2023 [Dkt. No. 207-1], BRG is identified as an alleged unsecured creditor.

In addition, it is possible that certain of the Members, "of counsel" and associates of Otterbourg and such persons' relatives may have familial or personal relationships, as well as business, contractual, or economic relationships, with officers, directors, and/or shareholders or creditors of the Debtor, competitors of the Debtor, other professionals engaged in this Case and/or other parties in interest in this Case. I have not been made aware of any material relationships with any such individual, except as follows:

- (x) According to the resolutions (the "Resolutions") adopted on April 2, 2023 by the Debtor's board of managers (the "Board"), a copy of which is attached as Exhibit A to the Debtor's chapter 11 bankruptcy petition filed in this Case [Dkt. No. 1], the Board has authorized the Debtor's retention of certain law firms, including, for example, Skadden, Arps, Slate, Meagher & Flom LLP ("Skadden"), in connection with this Case. Otterbourg discloses that a Member of the Firm of Otterbourg has a spouse that is a Partner at Skadden. It is my understanding that the spouse at Skadden is not involved in this Case. Moreover, the relevant Otterbourg attorney has not and will not be involved in this Case in any way and has not and will not have access to the electronic files maintained by Otterbourg relating to its proposed retention by the Committee in this Case.

I am not related to and, to the best of my knowledge, no other attorney at Otterbourg is related to (a) any United States Bankruptcy Judge for the District of New Jersey or (b) the United States Trustee for Region 3, or any person employed in the office of the United States Trustee for Region 3.

If and to the extent Otterbourg has a conflict with respect to a particular client or matter, it is the Committee and Otterbourg's understanding that the Committee will utilize, subject to the

Court's approval, other counsel to represent the Committee's interest with respect to such client or matter.

For the reasons stated herein, based on the conflicts search conducted to date and described here, to the best of my knowledge Otterbourg is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and as used in section 328(c) of the Bankruptcy Code, and does not have an interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity holders of the Debtor.

Otterbourg will promptly disclose and file a supplemental certification if any information is subsequently discovered that is pertinent to the statements and disclosures made herein.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None
- ☒ Describe connection:

See paragraph 5 above and Schedule 2 attached hereto.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

- ☒ do not hold an adverse interest to the estate.
- ☒ do not represent an adverse interest to the estate.
- ☒ are disinterested under 11 U.S.C. § 101(14).
- ☐ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☐ Other. Explain: _____

8. Description of Protocols to Avoid Unnecessary Duplication of Services:

In light of the size of this Case and scope of related litigation, the Committee determined it was in the talc claimants' best interest to retain multiple law firms. Each of the firms the Committee has proposed to retain serves a distinct purpose from the others:

- a. Brown Rudnick LLP serves as lead bankruptcy counsel, providing a deep bench of attorneys with core bankruptcy, bankruptcy litigation and mass tort bankruptcy experience.
- b. Otterbourg serves as lead mass tort/litigation counsel and special bankruptcy counsel, providing the unique perspective of a former bankruptcy chief judge and expertise in preliminary injunction and district court litigation.
- c. Massey & Gail LLP serves as special counsel, providing unparalleled mass tort and other complex case experience before trial and appellate courts, including the United States Supreme Court.
- d. Genova Burns LLC serves as local counsel, one of the few New Jersey firms with appropriate experience that is without conflicts in this Case.
- e. MoloLamken LLP serves as the Committee's special counsel for appeals. MoloLamken is a preeminent appellate firm with substantial experience before the highest courts in the country, as well as before the Third Circuit Court of Appeals in LTL I.

Additionally, co-counsel to the Committee has instituted the following multi-step system for efficiency purposes and in order to avoid unnecessary duplication of services:

- a. First, a small group of senior partners confer to determine strategy in consultation with Committee members and their designated representatives.
- b. Next, one firm is assigned primary responsibility for a task.
- c. Once a task has been preliminarily completed, it is reviewed by the other firms, allowing the firm to whom the task is assigned to benefit from the extensive knowledge and varying perspectives of co-counsel.
- d. Once co-counsel have signed off on a particular task, it is circulated to the Committee for review and comment.

Otterbourg believes that the above protocol is consistent with effective management of assignments in a mega bankruptcy case as well as how such matters are handled by large law firms such as those sought to be retained by the Debtor and its affiliates in other bankruptcy cases.

I certify under penalty of perjury that the above information is true.

Date: May 2, 2023

/s/ Melanie L. Cyganowski
Melanie L. Cyganowski

Schedule 1

Potentially Interested Parties

Debtor

LTL Management LLC

Direct Equity Owner of Debtor

Johnson & Johnson Holdco (NA) Inc.

Debtor's Direct Non-Debtor Subsidiary

Royalty A&M LLC

Other Non-Debtor Affiliates

3Dintegrated ApS

ABD Holding Company, Inc.

ABIOMED R&D, Inc.

ABIOMED, Inc.

Acclarent, Inc.

Actelion Ltd

Actelion Pharmaceuticals Ltd

Actelion Pharmaceuticals Trading
(Shanghai) Co., Ltd.

Actelion Pharmaceuticals US, Inc.

Actelion Treasury Unlimited Company

Albany Street LLC

ALZA Corporation

Alza Land Management, Inc.

AMO (Hangzhou) Co., Ltd.

AMO (Shanghai) Medical Devices
Trading Co., Ltd.

AMO ASIA LIMITED

AMO Australia Pty Limited

AMO Canada Company

AMO Denmark ApS

AMO Development, LLC

AMO France

AMO Germany GmbH

AMO Groningen B.V.

AMO International Holdings
Unlimited Company

AMO Ireland

AMO Italy SRL

AMO Japan K.K.

AMO Manufacturing USA, LLC

AMO Netherlands BV

AMO Nominee Holdings, LLC

AMO Norway AS

AMO Puerto Rico Manufacturing, Inc.

AMO Sales and Service, Inc.

AMO Singapore Pte. Ltd.

AMO Spain Holdings, LLC

AMO Switzerland GmbH

AMO United Kingdom, Ltd.

AMO Uppsala AB

Anakuria Therapeutics, Inc.

AorTx, Inc.

Apsis SAS

Aragon Pharmaceuticals, Inc.

Asia Pacific Holdings, LLC

Atrionix, Inc.

AUB Holdings LLC

Auris Health, Inc.

Backsvalan 6 Handelsbolag

Beijing Dabao Cosmetics Co., Ltd.

BeneVir BioPharm, Inc.

Berna Rhein B.V.

BioMedical Enterprises, Inc.

Biosense Webster (Israel) Ltd.

Biosense Webster, Inc.

Breeth, Inc.

C Consumer Products Denmark ApS

Carlo Erba OTC S.r.l.

Centocor Biologics, LLC

Centocor Research & Development, Inc.

Cerenovus, Inc.

ChromaGenics B.V.

Ci:z. Labo Co., Ltd.

Cilag AG

Cilag GmbH International

Cilag Holding AG

Cilag Holding Treasury Unlimited Company

Cilag-Biotech, S.L.

Coherex Medical, Inc.

ColBar LifeScience Ltd.

Consumer Test Entity

Cordis de Mexico, S.A. de C.V.

Corimmun GmbH

CoTherix Inc.

CRES Holdings, Inc.

CrossRoads Extremity Systems, LLC

CSATS, Inc.

Debs-Vogue Corporation

(Proprietary) Limited

DePuy Hellas SA

DePuy International Limited

DePuy Ireland Unlimited Company

DePuy Mexico, S.A. de C.V.
DePuy Mitek, LLC
DePuy Orthopaedics, Inc.
DePuy Products, Inc.
DePuy Spine, LLC
DePuy Synthes Institute, LLC
DePuy Synthes Products, Inc.
DePuy Synthes Sales, Inc.
DePuy Synthes, Inc.
Dutch Holding LLC
ECL7, LLC
EES Holdings de Mexico,
S. de R.L. de C.V.
EES, S.A. de C.V.
EIT Emerging Implant Technologies GmbH
Ethicon Endo-Surgery (Europe) GmbH
Ethicon Endo-Surgery, Inc.
Ethicon Endo-Surgery, LLC
Ethicon LLC
Ethicon Sarl
Ethicon US, LLC
Ethicon Women's Health & Urology Sarl
Ethicon, Inc.
Ethnor (Proprietary) Limited
Ethnor del Istmo S.A.
Ethnor Farmaceutica, S.A.
Finsbury (Development) Limited
Finsbury (Instruments) Limited
Finsbury Medical Limited
Finsbury Orthopaedics International Limited
Finsbury Orthopaedics Limited
FMS Future Medical System SA
GATT Technologies B.V.
GH Biotech Holdings Limited
Global Investment Participation B.V.
GMED Healthcare BV
Guangzhou Bioseal Biotech Co., Ltd.
Hansen Medical Deutschland GmbH
Hansen Medical International, Inc.
Hansen Medical UK Limited
Hansen Medical, Inc.
Healthcare Services (Shanghai) Ltd.
I.D. Acquisition Corp.
Innomedic Gesellschaft fur innovative
Medizintechnik und Informatik mbH
J & J Company West Africa Limited

J&J Argentina S.A.
J&J Pension Trustees Limited
J&J Productos Medicos & Farmaceuticos
del Peru S.A.
J.C. General Services BV
Janssen Biologics (Ireland) Limited
Janssen Biologics B.V.
Janssen BioPharma, LLC
Janssen Biotech, Inc.
Janssen Cilag Farmaceutica S.A.
Janssen Cilag S.p.A.
Janssen Cilag SPA
Janssen Cilag, C.A.
Janssen Development Finance Unlimited
Company
Janssen Egypt LLC
Janssen Farmaceutica Portugal Lda
Janssen France Treasury Unlimited
Company
Janssen Global Services, LLC
Janssen Holding GmbH
Janssen Inc.
Janssen Irish Finance Unlimited Company
Janssen Japan Treasury Unlimited Company
Janssen Korea Ltd.
Janssen Mexico Treasury Unlimited
Company
Janssen Oncology, Inc.
Janssen Ortho LLC
Janssen Pharmaceutica (Proprietary)
Limited
Janssen Pharmaceutica NV
Janssen Pharmaceutica S.A.
Janssen Pharmaceutical K.K.
Janssen Pharmaceutical Sciences
Unlimited Company
Janssen Pharmaceutical Unlimited Company
Janssen Pharmaceuticals, Inc.
Janssen Products, LP
Janssen R&D Ireland Unlimited Company
Janssen Research & Development, LLC
Janssen Sciences Ireland Unlimited
Company
Janssen Scientific Affairs, LLC
Janssen Supply Group, LLC
Janssen Vaccines & Prevention B.V.

Janssen Vaccines Corp.
Janssen-Cilag
Janssen-Cilag (New Zealand) Limited
Janssen-Cilag A/S
Janssen-Cilag AG
Janssen-Cilag Aktiebolag
Janssen-Cilag AS
Janssen-Cilag B.V.
Janssen-Cilag d.o.o. Beograd
Janssen-Cilag de Mexico S. de R.L. de C.V.
Janssen-Cilag Farmaceutica Lda.
Janssen-Cilag Farmaceutica Ltda.
Janssen-Cilag GmbH
Janssen-Cilag International NV
Janssen-Cilag Kft.
Janssen-Cilag Limited
Janssen-Cilag Manufacturing, LLC
Janssen-Cilag NV
Janssen-Cilag OY
Janssen-Cilag Pharma GmbH
Janssen-Cilag Pharmaceutical S.A.C.I.
Janssen-Cilag Polska, Sp. z o.o.
Janssen-Cilag Pty Ltd
Janssen-Cilag S.A.
Janssen-Cilag s.r.o.
Janssen-Cilag, S.A.
Janssen-Cilag, S.A. de C.V.
Janssen-Pharma, S.L.
J-C Health Care Ltd.
Jevco Holding, Inc.
JJ Surgical Vision Spain, S.L.
JJC Acquisition Company B.V.
JJHC, LLC
JJSV Belgium BV
JJSV Manufacturing Malaysia SDN. BHD.
JJSV Norden AB
JJSV Produtos Oticos Ltda.
JNJ Global Business Services s.r.o.
JNJ Holding EMEA B.V.
JNJ International Investment LLC
JNTL (APAC) HoldCo 2 LLC
JNTL (APAC) HoldCo 3 Pte. Ltd.
JNTL (APAC) HoldCo LLC
JNTL (APAC) HoldCo Pte. Ltd.
JNTL (Japan) HoldCo Inc.
JNTL (Malaysia) Sdn. Bhd.

JNTL (Middle East) HoldCo LLC
JNTL (Puerto Rico) HoldCo GmbH
JNTL (Shanghai) Investment Co., Ltd.
JNTL (Switzerland) HoldCo GmbH
JNTL (Thailand) HoldCo LLC
JNTL (UK) HoldCo Limited
JNTL Consumer Health (Belgium) BV
JNTL Consumer Health (Brazil) Ltda.
JNTL Consumer Health
(Czech Republic) s.r.o.
JNTL Consumer Health
(Dominican Republic), S.A.S.
JNTL Consumer Health (Finland) Oy
JNTL Consumer Health (France) SAS
JNTL Consumer Health (Hungary) Kft
JNTL Consumer Health (India)
Private Limited
JNTL Consumer Health
(New Zealand) Limited
JNTL Consumer Health (Norway) AS
JNTL Consumer Health (Philippines) Inc.
JNTL Consumer Health (Poland) sp. z o.o.
JNTL Consumer Health (Portugal) Limitada
JNTL Consumer Health (Services) LLC
JNTL Consumer Health (Slovakia), s.r.o.
JNTL Consumer Health (Spain), S.L.
JNTL Consumer Health (Taiwan) Limited
JNTL Consumer Health (Vietnam) Co. Ltd.
JNTL Consumer Health General
Services BV
JNTL Consumer Health I (Ireland) Limited
JNTL Consumer Health I
(Switzerland) GmbH
JNTL Consumer Health II
(Switzerland) GmbH
JNTL Consumer Health LLC
JNTL Consumer Health Mexico,
S. de R.L. de C.V.
JNTL Consumer Health Middle
East FZ-LLC
JNTL HoldCo 2 LLC
JNTL HoldCo 3 LLC
JNTL HoldCo 4 LLC
JNTL HoldCo 5 LLC
JNTL HoldCo 6 LLC
JNTL HoldCo 7 LLC

JNTL HoldCo 8 LLC
JNTL HoldCo LLC
JNTL Holdings 2, Inc.
JNTL Holdings 3, Inc.
JNTL Holdings B.V.
JNTL Holdings, Inc.
JNTL Ireland HoldCo 2 B.V.
JNTL Netherlands HoldCo B.V.
JNTL Turkey Tuketici Sagligi
Limited Sirketi
Johnson & Johnson
Johnson & Johnson - Societa' Per Azioni
Johnson & Johnson (Angola), Limitada
Johnson & Johnson (Australia) Pty Ltd
Johnson & Johnson (Canada) Inc.
Johnson & Johnson (China) Investment Ltd.
Johnson & Johnson (Ecuador) S.A.
Johnson & Johnson (Egypt) S.A.E.
Johnson & Johnson (Hong Kong) Limited
Johnson & Johnson (Ireland) Limited
Johnson & Johnson (Jamaica) Limited
Johnson & Johnson (Kenya) Limited
Johnson & Johnson (Middle East) Inc.
Johnson & Johnson (Mozambique),
Limitada
Johnson & Johnson (Namibia)
(Proprietary) Limited
Johnson & Johnson (New Zealand) Limited
Johnson & Johnson (Philippines), Inc.
Johnson & Johnson (Private) Limited
Johnson & Johnson (Singapore)
Holdco LLC
Johnson & Johnson (Thailand) Ltd.
Johnson & Johnson (Trinidad) Limited
Johnson & Johnson (Vietnam) Co., Ltd
Johnson & Johnson AB
Johnson & Johnson AG
Johnson & Johnson Bulgaria EOOD
Johnson & Johnson China Ltd.
Johnson & Johnson Consumer
(Hong Kong) Limited
Johnson & Johnson Consumer
(Thailand) Limited
Johnson & Johnson Consumer B.V.
Johnson & Johnson Consumer
Holdings France

Johnson & Johnson Consumer Inc.
Johnson & Johnson Consumer NV
Johnson & Johnson Consumer
Saudi Arabia Limited
Johnson & Johnson Consumer Services
EAME Ltd.
Johnson & Johnson d.o.o.
Johnson & Johnson de Argentina S.A.C. e. I.
Johnson & Johnson de Chile S.A.
Johnson & Johnson de Colombia S.A.
Johnson & Johnson de Mexico, S.A. de C.V.
Johnson & Johnson de Uruguay S.A.
Johnson & Johnson de Venezuela, S.A.
Johnson & Johnson del Ecuador, S.A.
Johnson & Johnson Del Paraguay, S.A.
Johnson & Johnson del Peru S.A.
Johnson & Johnson do Brasil Industria E
Comercio de Produtos Para Saude Ltda.
Johnson & Johnson Dominicana, S.A.S.
Johnson & Johnson Enterprise
Innovation Inc.
Johnson & Johnson European Treasury
Unlimited Company
Johnson & Johnson Finance Corporation
Johnson & Johnson Finance Limited
Johnson & Johnson Financial
Services GmbH
Johnson & Johnson for Export and
Import LLC
Johnson & Johnson Gateway, LLC
Johnson & Johnson Gesellschaft m.b.H.
Johnson & Johnson GmbH
Johnson & Johnson GT, Sociedad Anonima
Johnson & Johnson Guatemala, S.A.
Johnson & Johnson Health and Wellness
Solutions, Inc.
Johnson & Johnson Health Care
Systems Inc.
Johnson & Johnson Hellas Commercial and
Industrial S.A.
Johnson & Johnson Hellas Consumer
Products Commercial Societe Anonyme
Johnson & Johnson Hemisferica S.A.
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Holding GmbH

Johnson & Johnson Holdings
(Austria) GmbH
Johnson & Johnson Inc.
Johnson & Johnson Industrial Ltda.
Johnson & Johnson Innovation - JJDC, Inc.
Johnson & Johnson Innovation Limited
Johnson & Johnson Innovation LLC
Johnson & Johnson International
Johnson & Johnson International
(Singapore) Pte. Ltd.
Johnson & Johnson International Financial
Services Unlimited Company
Johnson & Johnson Irish Finance
Company Limited
Johnson & Johnson K.K.
Johnson & Johnson Kft.
Johnson & Johnson Korea Selling &
Distribution LLC
Johnson & Johnson Korea, Ltd.
Johnson & Johnson Limited
Johnson & Johnson LLC
Johnson & Johnson Luxembourg Finance
Company Sarl
Johnson & Johnson Management Limited
Johnson & Johnson Medical (China) Ltd.
Johnson & Johnson Medical
(Proprietary) Ltd
Johnson & Johnson Medical (Shanghai) Ltd.
Johnson & Johnson Medical (Suzhou) Ltd.
Johnson & Johnson Medical B.V.
Johnson & Johnson Medical Devices
&
Diagnostics Group - Latin America,
L.L.C.
Johnson & Johnson Medical GmbH
Johnson & Johnson Medical Greece
Single Member S.A.
Johnson & Johnson Medical Korea Ltd.
Johnson & Johnson Medical Limited
Johnson & Johnson Medical Mexico,
S.A. de C.V.
Johnson & Johnson Medical NV
Johnson & Johnson Medical
Products GmbH
Johnson & Johnson Medical Pty Ltd
Johnson & Johnson Medical S.A.

Johnson & Johnson Medical S.p.A.
Johnson & Johnson Medical SAS
Johnson & Johnson Medical
Saudi Arabia Limited
Johnson & Johnson Medical Taiwan Ltd.
Johnson & Johnson Medical, S.C.S.
Johnson & Johnson Medikal Sanayi ve
Ticaret Limited Sirketi
Johnson & Johnson MedTech
(Thailand) Ltd.
Johnson & Johnson Medtech
Colombia S.A.S.
Johnson & Johnson Middle East FZ-LLC
Johnson & Johnson Morocco
Societe Anonyme
Johnson & Johnson Nordic AB
Johnson & Johnson Pacific Pty Limited
Johnson & Johnson Pakistan
(Priate) Limited
Johnson & Johnson Panama, S.A.
Johnson & Johnson Personal Care
(Chile) S.A.
Johnson & Johnson Pharmaceutical Ltd.
Johnson & Johnson Poland Sp. z o.o.
Johnson & Johnson Private Limited
Johnson & Johnson Pte. Ltd.
Johnson & Johnson Pty. Limited
Johnson & Johnson Romania S.R.L.
Johnson & Johnson S.E. d.o.o.
Johnson & Johnson S.E., Inc.
Johnson & Johnson Sante Beaute France
Johnson & Johnson SDN. BHD.
Johnson & Johnson Services, Inc.
Johnson & Johnson Surgical Vision India
Private Limited
Johnson & Johnson Surgical Vision, Inc.
Johnson & Johnson Taiwan Ltd.
Johnson & Johnson UK Treasury
Company Limited
Johnson & Johnson Ukraine LLC
Johnson & Johnson Urban
Renewal Associates
Johnson & Johnson Vision Care
(Australia) Pty Ltd
Johnson & Johnson Vision Care
(Shanghai) Ltd.

Johnson & Johnson Vision Care Ireland
Unlimited Company
Johnson & Johnson Vision Care, Inc.
Johnson & Johnson Vision Korea, Ltd.
Johnson & Johnson, Lda
Johnson & Johnson, S.A.
Johnson & Johnson, S.A. de C.V.
Johnson & Johnson, s.r.o.
Johnson & Johnson, s.r.o.
Johnson and Johnson (Proprietary) Limited
Johnson and Johnson Sihhi Malzeme Sanayi
Ve Ticaret Limited Sirketi
Johnson Y Johnson de Costa Rica, S.A.
JOM Pharmaceutical Services, Inc.
Kenvue Inc.
La Concha Land Investment Corporation
McNeil AB
McNeil Consumer Pharmaceuticals Co.
McNeil Denmark ApS
McNeil Healthcare (Ireland) Limited
McNeil Healthcare (UK) Limited
McNeil Healthcare LLC
McNeil Iberica S.L.U.
McNeil LA LLC
McNEIL MMP, LLC
McNeil Nutritionals, LLC
McNeil Panama, LLC
McNeil Products Limited
McNeil Sweden AB
Medical Device Business Services, Inc.
Medical Devices & Diagnostics
Global Services, LLC
Medical Devices International LLC
Medos International Sarl
Medos Sarl
MegaDyne Medical Products, Inc.
Menlo Care De Mexico, S.A. de C.V.
Mentor B.V.
Mentor Deutschland GmbH
Mentor Medical Systems B.V.
Mentor Partnership Holding
Company I, LLC
Mentor Texas GP LLC
Mentor Texas L.P.
Mentor Worldwide LLC
Middlesex Assurance Company Limited

Momenta Ireland Limited
Momenta Pharmaceuticals, Inc.
NeoStrata Company, Inc.
NeoStrata UG (haftungsbeschränkt)
Netherlands Holding Company
Neuravi Limited
NeuWave Medical, Inc.
Novira Therapeutics, LLC
NuVera Medical, Inc.
Obtech Medical Mexico, S.A. de C.V.
OBTECH Medical Sarl
OGX Beauty Limited
OMJ Holding GmbH
OMJ Pharmaceuticals, Inc.
Omrix Biopharmaceuticals Ltd.
Omrix Biopharmaceuticals NV
Omrix Biopharmaceuticals, Inc.
Ortho Biologics LLC
Ortho Biotech Holding LLC
Orthospin Ltd.
Orthotaxy SAS
Patriot Pharmaceuticals, LLC
Peninsula Pharmaceuticals, LLC
Percivia LLC
Pharmadirect Ltd.
Pharmedica Laboratories
(Proprietary) Limited
preCARDIA, Inc.
Princeton Laboratories, Inc.
Productos de Cuidado Personal y
de La Salud de Bolivia S.R.L.
Proleader S.A.
Prosidian, Inc.
PT Integrated Healthcare Indonesia
PT Johnson & Johnson Indonesia
PT Johnson and Johnson Indonesia Two
Pulsar Vascular, Inc.
Regency Urban Renewal Associates
RespiVert Ltd.
Review Manager Test Entity 2
Royalty A&M LLC
Rutan Realty LLC
Scios LLC
Serhum S.A. de C.V.
Shanghai Elsker Mother & Baby Co., Ltd
Shanghai Johnson & Johnson Ltd.

Shanghai Johnson & Johnson
Pharmaceuticals Ltd.
Sodiac ESV
Spectrum Vision Limited Liability Company
Spectrum Vision Limited Liability
Partnership
SterilMed, Inc.
Surgical Process Institute
Deutschland GmbH
Synthes Costa Rica S.C.R., Limitada
SYNTHES GmbH
Synthes GmbH
Synthes Holding AG
Synthes Holding Limited
SYNTHES Medical Immobilien GmbH
Synthes Medical Surgical Equipment &
Instruments Trading LLC
Synthes Produktions GmbH
Synthes Proprietary Limited
Synthes S.M.P., S. de R.L. de C.V.
Synthes Tuttlingen GmbH
Synthes USA Products, LLC
Synthes USA, LLC
Synthes, Inc.
TARIS Biomedical LLC
TearScience, Inc.
The Anspach Effort, LLC
The Vision Care Institute, LLC
Tibotec, LLC
Torax Medical, Inc.
UAB "Johnson & Johnson"
Vania Expansion
Verb Surgical Inc.
Vision Care Finance Unlimited Company
Vogue International LLC
WH4110 Development Company, L.L.C.
Xian Janssen Pharmaceutical Ltd.
XO1 Limited
Zarbee's, Inc.

Managers and Officers of the Debtor

John Kim
Richard Dickinson
Robert Wuesthoff
Russell Deyo

Major Current Business Affiliations of Debtor's Managers

American Foundation for Opioid
Alternatives
Migration Policy Institute
Miller Center for Community Protection &
Reliance, Eagleton Institute of Politics,
Rutgers University
National Center for State Courts
National Council, McLean Hospital
One Mind

Depository and Disbursement Banks

Bank of America, N.A.

Major Sureties

Chubb
Federal Insurance Company
Liberty Mutual Insurance Company
Travelers Casualty and Surety Company
of America

Parties to Material Contracts With the Debtor

Johnson & Johnson
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Services, Inc.

Significant Co-Defendants in Talc-Related Litigation

3M Company
A.O. Smith Corporation
Albertsons Companies, Inc.
Avon Products, Inc.
Barretts Minerals, Inc.
BASF Catalysts LLC
Block Drug Company, Inc.
Borg Warner Morse Tec, Inc.
Brenntag North America
Brenntag Specialties, Inc.
Bristol-Myers Squibb Company
Carrier Corporation
Chanel, Inc.
Charles B. Chrystal Co., Inc.
Chattem, Inc.
Colgate-Palmolive Company
Conopco Inc.

Costco Wholesale Corporation
Coty, Inc.
Crane Co.
CVS Health Corporation
CVS Pharmacy, Inc.
Cyprus Amax Minerals Company
Cyprus Mines Corporation
Dana Companies, LLC
DAP Products, Inc.
Dollar General Corporation
Duane Reade Inc.
Eaton Corporation
Eli Lilly and Company
Elizabeth Arden, Inc.
Estee Lauder Inc.
Family Dollar Stores Inc.
Flowserve US, Inc.
FMC Corporation
Food 4 Less of California, Inc.
Ford Motor Company
Foster Wheeler, LLC
Gardner Denver, Inc.
General Electric Company
Genuine Parts Company
Goodyear Tire & Rubber Co.
Goulds Pumps, LLC
Grinnell LLC
Honeywell International, Inc.
Imerys Talc America, Inc.
Imerys USA, Inc.
IMO Industries Inc.
John Crane, Inc.
K&B Louisiana Corporation
Kaiser Gypsum Company, Inc.
Kmart Corporation
Kolmar Laboratories
Longs Drug Stores California
L'Oreal USA, Inc.
Lucky Stores, Inc.
Macy's, Inc.
Mary Kay Inc.
Maybelline LLC
Metropolitan Life Insurance Company
Noxell Corporation
Personal Care Products Council
Pfizer, Inc.

Pharma Tech Industries, Inc.
Pneumo Abex, LLC
PTI Royston, LLC
Publix Super Markets, Inc.
R.T. Vanderbilt Holding Company, Inc.
Ralphs Grocery Company
Revlon Consumer Products Corporation
Revlon, Inc.
Rite Aid Corporation
Safeway, Inc.
Sanofi-Aventis U.S. LLC
Shulton, Inc.
Specialty Minerals Inc.
Target Corporation
The Dow Chemical Company
The Estee Lauder Companies, Inc.
The Kroger Co.
The Procter & Gamble Company
Thrifty Payless, Inc.
Unilever Home & Personal Care USA
Union Carbide Corporation
Vanderbilt Minerals, LLC
ViacomCBS, Inc.
Walgreen Co.
Walmart, Inc.
Warren Pumps, LLC
Whittaker Clark & Daniels, Inc.
Wyeth Holdings LLC
Yves Saint Laurent America, Inc.

**Debtor's Proposed Professionals and
Claims Agent**

AlixPartners LLP
Bates White LLC
Blake, Cassels & Graydon LLP
Epiq Corporate Restructuring LLC
Hogan Lovells
Jones Day
King & Spalding LLP
McCarter & English, LLP
Orrick, Herrington, & Sutcliffe, LLP
Shook, Hardy & Bacon L.L.P.
Skadden, Arps, Slate, Meager & Flom LLP
Weil Gotshal & Manges LLP
Wollmuth Maher & Deutsch LLP

**Debtor's Proposed Significant Ordinary
Course Professionals, Consultants and
Service Providers**

Adler Pollock & Sheehan PC
Barrasso Usdin Kupperman
Freeman & Sarver, L.L.C.
Blank Rome LLP
Butler Snow LLP
Carlton Fields, P.A.
Chehardy, Sherman, Williams,
Recile, & Hayes
Damon Key Leong Kupchak Hastert
Davis Hatley Haffeman & Tighe
Dechert LLP
Elliott Law Offices, PA
Faegre Drinker Biddle & Reath LLP
Folliart, Huff, Ottaway & Bottom
Gibson, Dunn & Crutcher LLP
Goldman Ismail Tomaselli Brennan &
Baum
Hartline Barger
HeplerBroom LLC
Irwin Fritchie Urquhart & Moore LLC
Johnson & Bell Ltd.
Jones, Skelton & Hochuli, P.L.C.
Kaplan, Johnson, Abate & Bird LLP
Kelley Jasons McGowan Spinelli
Hanna & Reber, LLP
Kirkland & Ellis LLP
Kitch Drutchas Wagner
Valitutti & Sherbrook
Lewis Brisbois Bisgaard & Smith, LLP
Manion Gaynor & Manning LLP
Manning Gross + Massenburg
Miles & Stockbridge
Milligan & Herns
Morgan Lewis
Nelson Mullins Riley & Scarborough, LLP
Nutter McClennen & Fish LLP
Patterson Belknap Webb & Tyler LLP
Proskauer Rose LLP
Quattlebaum, Grooms & Tull PLLC
Schnader Harrison Segal & Lewis
Schwabe Williamson & Wyatt
Sills Cummis & Gross P.C.
Stoel Rives LLP

Sullivan Whitehead & Deluca LLP
Swartz Campbell LLC
The Weinhardt Law Firm
Tucker Ellis LLP
Willcox & Savage, P.C.

**Known Professionals for Certain
Non-Debtor Parties in Interest**

Barnes & Thornburg, LLP
Cravath, Swaine & Moore
White & Case LLP

**Proposed Future Claimants'
Representative and Her Proposed
Professional**

Randi S. Ellis
Walsh Pizzi O'Reilly Falanga LLP

Material Potentially Indemnified Parties

Bausch Health Companies Inc.
Cyprus Mines Corporation
Cyprus Talc Corp.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Luzenac America, Inc.
Pharma Tech Industries, Inc.
PTI Royston, LLC
Rio Tinto America, Inc.
RTZ America, Inc.
Valeant Pharmaceuticals International, Inc.
Windsor Minerals Inc.
Costco Wholesale Corporation
Publix Super Markets, Inc.
Rite Aid Corporation
Safeway Inc.
Walmart Inc.

**Parties Who Have Entered Into Plan
Support Agreements**

Andres Pereira Firm
Ferrer, Poirot & Wansbrough
Johnson Law Group
Liakos Law, APC
Linville Law Group
McDonald Worley
Nachawati Law Group
OnderLaw, LLC

Pulaski Kherkher PLLC
Rueb Stoller Daniel, LLP
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Watts Guerra LLP
Wisner Baum, LLP

**Law Firms with Significant
Representations of Talc Claimants**

Andres Pereira Firm
Arnold & Itkin LLP
Aylstock, Witkin, Kreis &
Overholtz, PLLC
Beasley Allen Law Firm
Childers, Schlueter & Smith LLC
Ferrer, Poirot & Wansbrough
Johnson Law Group
Linville Law Group
McDonald Worley
Miller Firm, LLC
Nachawati Law Group
Napoli Shkolnik PLLC
OnderLaw, LLC
Pulaski Kherkher PLLC
Robinson Calcagnie
Rueb Stoller Daniel, LLP
Sanders, Phillips, Grossman, LLC
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Wagstaff Law Firm
Watts Guerra LLP
Wisner Baum, LLP

**Key Parties in *Imerys Talc America, Inc.*
and *Cyprus Mines Corp.* Chapter 11 Cases**

Cyprus Amax Minerals Company
Cyprus Mines Corporation
Cyprus Talc Corporation
Imerys S.A.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
(fka Windsor Minerals Inc.)
James L. Patton
Luzenac America, Inc.
Official Committee of Tort Claimants

(*In re Imerys Talc America, Inc.*)
Official Committee of Tort Claimants
(*In re Cyprus Mines Corp.*)
Roger Frankel

Debtor's Insurers

A.G. Securitas
ACE Property & Casualty Insurance
Company
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Europe S.A.
AIG Property and Casualty Company
AIU Ins. Company
Allianz Global Risks US
Insurance Company
Allianz Ins. Company
Allstate Insurance Company
American Centennial Ins. Company
American Motorists Ins. Company
American Re-Insurance Company
Arrowood Indemnity Company
ASR Schadeverzekering N.V.
Assurances Generales De France
Assurantiekantoor VanWijk & Co.
Atlanta International Insurance Company
Birmingham Fire Ins. Company of
Pennsylvania
Central National Ins. Company of Omaha
Century Indemnity Company
Champion Dyeing Allocation Year
Chubb
City Ins. Company
Colonia Versicherungs AG, Koln
Company of N.Y.
Continental Insurance Company
Darag Deutsche Versicherungs-Und
Drake Ins. Company of New York
Employers Ins. Company of Wausau
Employers Ins. of Wausau
Employers Mutual Casualty Company
Eurinco Allgemeine
Everest Reinsurance Company
Fireman's Fund Ins. Company
First State Ins. Company
GAP
Gibraltar Casualty Company

Granite State Ins. Company
Great American
Great Northern Ins. Company
Great Southwest Fire Ins. Company
Groupe Drouot
Harbor Ins. Company
Hartford Accident and Indemnity Company
Home Ins. Company
Ideal Mutual Ins. Company
Industrial Indemnity Company
Ins. Company of North America
Ins. Company of the State of Pennsylvania
Ins. Corporation of Singapore Limited
Integrity Ins. Company
International Ins. Company
International Surplus Lines Ins. Company
Lexington Ins. Company
London Guarantee and Accident
L'Union Atlantique S.A. d'Assurances
Maas Lloyd
Mead Reinsurance Corporation
Middlesex Assurance Company
Midland Ins. Company
Midstates Reinsurance Corp.
Mission Ins. Company
Mission National Ins. Company
Munich Reinsurance America, Inc.
Mutual Fire, Marine, & Inland Ins.
Company
N.V. De Ark
N.V. Rotterdamse Assurantiemas
N.V. Schadeverzekeringsmaatschappij
National Casualty Company
National Union Fire Ins. Company of
Pittsburgh, PA
Nationwide
New Hampshire Ins. Company
North River Ins. Company
Northbrook Excess and Surplus
Ins. Company
Northeastern Fire Ins. Company
of Pennsylvania
Pacific Employers Ins. Company
ProSight
Prudential Reinsurance Company
Puritan Insurance Company

Republic Indemnity Company of America
Republic Ins. Company
Republic Western Ins. Company
Repwest Insurance Company
Resolute Management Inc.
Rheinland Versicherungen
Rheinland Verzekeringen
Riverstone Insurers
Royal Belge I.R., S.A. d'Assurances
Royal Indemnity Company
Royal Ins. Company
Ruckversicherungs-AG
Safety Mutual Casualty Corporation
Safety National Casualty Corporation
Seguros La Republica SA
Sentry Insurance A Mutual Company
Southern American Ins. Company
Starr Indemnity & Liability Company
TIG Insurance Company
Transamerica Premier Insurance Company
Transit Casualty Company
Travelers Casualty and Surety Company
UAP
Union Atlantique d'Assurances S.A.
Union Indemnity Ins. Company
of New York
Versicherungs AG, Dusseldorf
Westchester Fire Insurance Company
Westport Insurance Corporation
XL Ins. Company

Potential Parties in Canadian Proceeding

Cassels Brock & Blackwell LLP
Ernst & Young Inc

**States/Federal District With Consumer
Protection Investigations/Actions**

Alabama
Alaska
Arkansas
Arizona
Colorado
Connecticut
Delaware
Florida
Georgia
Hawaii

Idaho
Illinois
Iowa
Kansas
Kentucky
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Rhode Island
South Dakota
Texas
Utah
Vermont
Virginia
Washington
Washington, D.C.
West Virginia
Wisconsin

**The Office of the United States Trustee
Region 3 - District of New Jersey**

Adam Shaarawy
Adela Alfaro
Alexandria Nikolinos
Angeliza Ortiz-Ng
Daniel C. Kropiewnicki
David Gerardi
Fran B. Steele
Francyne D. Arendas
James Stives
Jeffrey Sponder
Joseph C. Kern

Kirsten K. Ardelean
Lauren Bielskie
Maggie McGee
Martha Hildebrandt
Michael Artis
Neidy Fuentes
Peter J. D'Auria
Robert J. Schneider, Jr.
Tia Green
Tina L. Oppelt
William J. Ziemer

**Bankruptcy Judges for the District of
New Jersey**

Judge Andrew B. Altenburg, Jr.
Judge Christine M. Gravelle
Judge Jerrold N. Poslusny, Jr.
Judge John K. Sherwood
Judge Kathryn C. Ferguson
Judge Michael B. Kaplan
Judge Rosemary Gambardella
Judge Stacey L. Meisel
Judge Vincent F. Papalia

Retailers and Indemnified Parties

7-Eleven
7-Eleven, Inc.
Acme Markets, Inc.
Ahold Delhaize USA, Inc.
Albertsons Companies, Inc.
Alpha Beta Company
Associated Wholesaler Grocers, Inc.
Bartell Drug Company
Bashas', Inc.
Bausch Health US, LLC
Bausch Health Americas, Inc.
Bausch Health Companies Inc.
BCW LLC
Best Market of Astoria, Inc.
BI-LO, LLC
Bi-Mart Corporation
C&S Wholesale Grocers
C&S Wholesale Grocers, Inc.
Classic Pharmacy, Inc.
Cosentino Enterprises, Inc.
Cosentino Group, Inc.
Cosentino Price Chopper

Cosentino's Food Stores
Costco Wholesale Corporation
CVS Health Corporation
CVS Pharmacy, Inc.
Demoulas Super Markets, Inc.
Dierbergs Markets, Inc.
Discount Drug Mart, Inc.
Dollar Tree Stores, Inc.
DRI I, Inc.
Duane Reade, Inc.
Eckerd Corporation of Florida, Inc.
Family Dollar Stores
Fleming Companies, Inc.
Food 4 Less of California
Food 4 Less of Southern California, Inc.
Foodland
Foodland Super Market, LTD
Foot Locker Specialties, Inc., individually
and as successor-in-interest to F.W.
Woolworth Co.
Foot Locker Specialty, Inc.
Foot Locker, Inc./Woolworth Corporation
Four B Corporation d/b/a Balls Food Stores
Fred Meyer Stores, Inc.
Fruth Pharmacy, Inc.
Gerlands Food Fair, LLC
Gerlands, LLC
Gerlands, LLC/Lewis Food Town, Inc.
Giant Eagle, Inc.
Giant Food of Maryland, LLC
Giant Food Stores, LLC
Grocery Outlet Holding Corporation
Grocery Outlet Inc.
Grocery Outlet, Inc.
HAC, Inc.
H-E-B, LP
Hughes Markets, Inc.
Hy-Vee, Inc.
Jewel Food Stores
Jewel Osco
Jewel Osco Southwest
K&B Corporation
K&B Louisiana Corporation
Kings Park Slope, Inc.
Kings Pharmacy
Kings Pharmacy Holdings, LLC

Kings Third Ave. Pharmacy, Inc.
Knorr Street ShopRite, Inc.
La Luz Market, LTD. Co.
Lewis Food Town, Inc.
Longs Drug Stores California, L.L.C
Longs Drug Stores of Southern California,
L.L.C.
Longs Drug Stores, L.L.C.
Lucky Stores, Inc.
Marc Glassman Inc.
Marc Glassman, Inc. d/b/a Marc's Store &
Pharmacy
MBF Healthcare Holdings, Inc.
MBF Healthcare Management, LLC
Meijer, Inc.
MMG Equity Partners
Navarro Discount Pharmacies No. 5, LLC
Navarro Discount Pharmacies, LLC
Owens & Minor Distribution, Inc.
Owens & Minor, Inc.
Piggly Wiggly Carolina Co.
Piggly Wiggly Carolina Co., Inc.
Piggly Wiggly Companies, Inc.
Piggly Wiggly, LLC
Piggly Wiggly, LLC (subsidiary of C&S
Wholesale Grocers)
PTI
PTI Royston LLC, a Georgia Limited
Liability Co., d/b/a Pharma Tech
Industries
PTI Union, LLC d/b/a Pharma Tech
Industries
Publix Super Markets, Inc.
Raley's
Ralphs Grocery Company
Randall's Food & Drug LP
Randall's Food Markets, Inc.
Rite Aid
Rite Aid Corporation
Rite Aid Hdqtrs. Corp.
Rite Aid of New York City, Inc.
Rite Aid of New York, Inc.
Rite Aid of Pennsylvania, Inc.
Rite Aid of South Carolina, Inc.
Rouse's Enterprises, L.L.C.

Rouse's Enterprises, L.L.C. d/b/a Rouses
Market
Safeway Inc.
Save Mart Supermarkets, Inc.
Save Mart Supermarkets, Inc./Lucky Stores
Schnuck Markets
Schnuck Markets, Inc.
Sedano's Market, Inc.
Shanti Pharmacy Corp.
Shaw's Supermarkets, Inc.
Shop-Rite Supermarkets, Inc. a/k/a Shop
Rite of Knorr Street
Smith Food and Drug Center, Inc.
Southeastern Grocers, Inc.
Star Markets Company, Inc.
Stater Bros. Markets
Super Center Concepts, Inc. d/b/a Superior
Grocers
Superior Grocers
SuperValu, Inc.
T. Levy Associates, d/b/a Beauty Land
Enterprises
T. Levy Associates, Inc. d/b/a Beauty Land
Enterprises/Beautyland
Target Corporation
The Bartell Drug Company
The Kroger Company
The Stop & Shop Supermarket Company
LLC
The Vons Companies, Inc.
Thrifty Payless, Inc.
Thrifty white Drug
Tops Holding, LLC
Valeant Pharmaceuticals International
Valeant Pharmaceuticals International, Inc.
Valeant Pharmaceuticals North America
LLC
Wakefern Food Corp.
Walgreen Co.
Walgreen Eastern Co., Inc.
Walgreen Pharmacy Strategies, LLC
Walgreens Boots Alliance, Inc.
Walmart Inc.
Wegmans Food Markets, Inc.
Winn-Dixie Stores, Inc.
Woolworth Corporation

Top 30 Law Firms

Andrew & Thorton
Ashcraft & Gerel, LLP
Alystock, Witkin, Kreis & Overholtz, PLLC
Barnes Firm
Beasley Allen Law Firm
Childers, Schlueter & Smith LLC
Cellino Law LLP
Driscoll Firm, LLC
Golomb Spirit Grunfeld, P.C.
Johnson Becker PLLC
Johnson Law Group
Lenze Lawyers, PLC
McDonald Worley
Miller Firm, LLC
Morelli Law Firm
Motley Rice LLC
Nachawati Law Firm
Napoli Shkolnik PLLC
Onder Law, LLC
Pulaski Kherkher PLLC
Robinson Calcagnie
Rueb Stoller Daniel, LLP
Sanders, Phillips
Simmons Hanly Conroy LLC
Slater Slater Schullman, LLP
Trammel PC
Wagstaff Law Firm
Watts Guerra LLP
Williams Hart Law Firm

**Top 20 Largest Unsecured Claims
(Excluding Insiders)**

Douglas Barden
Shawn Johnson
Christina Prudencio
Ashley Schmitz
FTI Consulting, Inc.
Brown Rudnick LLP
MoloLamken LLP
Walsh Pizzi O'Reilly Falanga LLP
Genova Burns LLP
Houlihan Lokey Capital, Inc.
Miller Thomson LLP
Massey & Gail LLP
CRA International, Inc.
Anderson Kill P.C.
Berkeley Research Group LLC
Bernstein Shur Sawyer & Nelson P.A.
Lighthouse Technologies, Inc.
Cassels Brock and Blackwell LLP
Albert Schwenk

Committee Members

Rebecca Love
c/o Ashcraft & Gerel, LLP
Attn: Michelle Parfitt

Tonya Whetsel
c/o Karst von Oiste LLP
Attn: Eric Karst

William A. Henry
c/o Levin Papantonio Rafferty
Attn: Christopher Tisi

Patricia Cook
c/o Weitz & Luxenberg, P.C.
Attn: Danny Kraft

Alishia Landrum
c/o Beasley Allen Law Firm
Attn: Leigh O'Dell

Blue Cross Blue Shield of Massachusetts
c/o Hill Hill Carter Franco Cole & Black,
PC

Attn: Elizabeth Carter

Kristie Doyle
c/o Kazan, McClain, Satterley &
Greenwood PLC
Attn: Steven Kazan

Randy Derouen
c/o Levy Konigsberg LLP
Attn: Audrey Raphael

April Fair
c/o Robinson Calcagnie, Inc.
Attn: Mark Robinson, Jr.

Brandi Carl
c/o Golomb Spirt Grunfeld
Attn: Richard Golomb

Sue Sommer-Kresse
c/o Motley Rice, LLC
Attn: Daniel Lapinski

Schedule 2
Client Data List

Client Data List

Current Otterbourg Clients

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
Bank of America, N.A.	Bank of America, N.A.	Bank account

Former Otterbourg Clients within last 15 years (date of last engagement)

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
<p>Ad Hoc Group of Certain Talc Claimants</p> <p>Members:</p> <ul style="list-style-type: none"> • Alishia Landrum (represented by Beasley Allen Law Firm) • Rebecca Love (represented by Ashcraft & Gerel, LLP) • Blue Cross Blue Shield of Massachusetts • Tonya Whetsel (represented by Karst von Oiste LLP) • Kristie Doyle (represented by Kazan, McClain, Satterley & Greenwood PLC) • William A. Henry (represented by Levin Papantonio Rafferty) • Randy Derouen (represented by Levy Konigsberg LLP) • April Fair (represented by Robinson Calcagnie, Inc.) • Patricia Cook (represented by Weitz & Luxenberg, P.C.) <p>(April 4-15, 2023; representation immediately ceased upon Otterbourg's selection as co-counsel to the official committee of talc claimants appointed in Debtor's second bankruptcy case, Case No. 23-12825)</p>	<p>Ad Hoc Group of Certain Talc Claimants</p>	<p>Representative of certain talc claimants</p>

Former Otterbourg Clients within last 15 years (date of last engagement)

(continued)

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
<p>Official Committee of Talc Claimants</p> <p>Members:</p> <ul style="list-style-type: none"> • Rebecca Love (represented by Ashcraft & Gerel, LLP) • Alishia Landrum (represented by Beasley Allen Law Firm) • Kellie Brewer (represented by Fears Nachawati Law Firm) • Blue Cross Blue Shield of Massachusetts • Tonya Whetsel (represented by Karst von Oiste LLP) • Kristie Doyle (represented by Kazan, McClain, Satterley & Greenwood PLC) • William A. Henry (represented by Levin Papantonio Rafferty) • Randy Derouen (represented by Levy Konigsberg LLP) • Darlene Evans (represented by OnderLaw, LLC) • April Fair (represented by Robinson Calcagnie, Inc.) • Patricia Cook (represented by Weitz & Luxenberg, P.C.) <p>(Appointed per Order dated November 8, 2021 and reinstated effective April 12, 2022 in Debtor's first bankruptcy case, Case No. 21-30589, at Dkt. Nos. 355, 1273; representation ceased on April 4, 2023 upon its dissolution pursuant to Order dismissing the Debtor's first bankruptcy case, Case No. 21-30589, at Dkt. Nos. 3938, 3939)</p>	<p>Official Committee of Talc Claimants</p>	<p>Representative of talc claimants</p>

Former Otterbourg Clients within last 15 years (date of last engagement)

(continued)

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
<p>Official Committee of Talc Claimants I</p> <p>Members:</p> <ul style="list-style-type: none"> • Kellie Brewer (represented by Fears Nachawati Law Firm) • Blue Cross Blue Shield of Massachusetts • Brandi Carl (represented by Golomb Spirt Grunfeld) • Shirleeta Ellison (represented by Motley Rice) • Darlene Evans (represented by OnderLaw, LLC) • April Fair (represented by Robinson Calcagnie, Inc.) • William A. Henry (represented by Levin Papantonio Rafferty) • Alishia Landrum (represented by Beasley Allen Law Firm) • Rebecca Love (represented by Ashcraft & Gerel, LLP) <p>(Appointed per Notice of the United States Trustee's Filing of Reconstituted and Amended: (i) Notice of Appointment of Official Committee of Talc Claimants I; and (ii) Notice of Appointment of Official Committee of Talc Claimants II filed on December 23, 2021 in Debtor's first bankruptcy case, Case No. 21-30589, at Dkt. No. 965; representation ceased upon the disbandment of the Official Committee of Talc Claimants I and reinstatement of the original committee on April 12, 2022)</p>	<p>Official Committee of Talc Claimants I</p>	<p>Representative of ovarian cancer claimants</p>

Former Otterbourg Clients within last 15 years (date of last engagement)

(continued)

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
Seeger Weiss LLP (2022; representation immediately ceased upon Otterbourg's selection as co-counsel to the Official Committee of Unsecured Creditors for Tort Claimants – Related to Use of Combat Arms Version 2 Earplugs appointed in the bankruptcy cases of Aearo Technologies LLC, <i>et al.</i> , pending in the United States Bankruptcy Court for the Southern District of Indiana, Case No. 22-02890)	Seeger Weiss LLP	Plaintiffs Law Firm; Party identified by the Debtor as having allegedly entered into a plan support agreement
Plaintiffs' Steering Committee (2021; representation immediately ceased upon Otterbourg's selection as co-counsel to the official committee of talc claimants appointed in Debtor's first bankruptcy case, Case No. 21-30589)	Plaintiffs' Steering Committee	Representative of Certain Claimants in the <i>In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation</i> (MDL No. 2738) before the United States District Court for the District of New Jersey
Beasley Allen Law Firm (2021; representation immediately ceased upon the PSC's retention of Otterbourg as counsel in Debtor's first bankruptcy case, Case No. 21-30589)	Beasley Allen Law Firm	Plaintiffs Law Firm

Former Otterbourg Clients within last 15 years (date of last engagement)

(continued)

<u>Client Name</u>	<u>Potentially Interested Parties</u>	<u>Potentially Interested Parties' Relationship to the Debtor</u>
Attorney General for the State of Texas (2019)	Attorney General for the State of Texas	Disclosed to the extent relevant to the State of Texas, which has been identified by the Debtor as one of the governmental authorities conducting investigations into unfair business practices and consumer protection violations.
XL Insurance America Co. (2018; limited engagement with no billings)	XL Ins. Company	Alleged insurer
Liberty Mutual Insurance Company (2010)	Liberty Mutual Insurance Company	Alleged major surety